

EXHIBIT C

REGULATORY RESOLUTIONS

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September 27, 2024

Via Email (dvacco@lippes.com)

Cell Gramercy 2 of Contego Insurance, Inc.
c/o Dennis C. Vacco
Lippes Mathias LLP
50 Fountain Plaza, Suite 1700
Buffalo, NY 14202

Cell Gramercy 2 of Contego Insurance, Inc.
14301 N. 87th Street, Suite 110
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Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*
U.S. District Court (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR
Determination that Cell Gramercy 2 of Contego Insurance, Inc. is a
Receivership Defendant

Dear Mr. Vacco:

As you are aware, on January 11, 2024, the U.S. District Court for the Western District of New York issued a Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief (“TRO”) in the above-referenced case, appointing me as the temporary receiver of the Receivership Defendants. On March 4, 2024, the Court entered a Preliminary Injunction, which continues the terms of the TRO and asset freeze and confirms my appointment as Receiver.

Receivership Defendants

The Preliminary Injunction defines “Receivership Defendants” as the Corporate Defendants¹ and their subsidiaries, affiliates, divisions, successors, and assigns, *as well as any other business related to the*

¹ The Preliminary Injunction defines “Corporate Defendants” to mean Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LL, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, Whitestone Client Services, LLC, and their successors, assigns, affiliates, or subsidiaries, and each of them by all names each might be known, including any fictitious business entities or business names created or used by these entities.

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Defendants' debt-relief services and which the Receiver has reason to believe is owned or controlled in whole or in part by any of the Defendants, and includes fictitious names under which they do business. *See Preliminary Injunction, Definitions, ¶ N (emphasis added).*

In the event the Receiver identifies an additional Receivership Entity, the Preliminary Injunction authorizes the Receiver to do the following:

If the Receiver identifies a nonparty entity as a Receivership Entity, promptly notify the entity as well as the parties, and inform the entity that it can challenge the Receiver's determination by filing a motion with the Court. Provided, however, that the Receiver may delay providing such notice until the Receiver has established control of the nonparty entity and its Assets and records, if the Receiver determines that notice to the entity may result in the destruction of records, dissipation of Assets, or any other obstruction of the Receiver's control of the entity[.]

Preliminary Injunction, Section IX.S., Duties of Receiver.

Determinations Regarding Receivership Defendants

I believe that Cell Gramercy 2 of Contego Insurance, Inc. ("Cell Gramercy") qualifies as a Receivership Defendant. That determination is based on a review of documents indicating that the owners and executive officers of Cell Gramercy include Defendants Ryan Sasson and Ian Behar and former StratFS, LLC executive Salvatore Tirabassi, and that Cell Gramercy's reserve was funded by Strategic Financial Solutions, LLC. Furthermore, by Text Order dated April 16, 2024, the Court found, *inter alia*, that the policy proceeds of Cell Gramercy are a Receivership Asset "both because Strategic and/or the Strategic entities may have competing rights to draw upon the policy funds and because any funds not paid on valid claims may revert back to Strategic and/or the Strategic entities, who appear to have funded the policy." *See*, Doc. No. 299.

I am happy to discuss this determination and will consider additional information you believe may change my conclusion. Further, if you wish to challenge the determination, you may do so by filing a motion with the Court. *See Preliminary Injunction, IX.S.*

Very truly yours,



Thomas W. McNamara

TWM:jej

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